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Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

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**BLENDI CUMANI, M.D. and  
ROLAND SHEHU,**

**Plaintiffs,**

**v.**

**CHRIS QUEEN,**

**Defendant.**

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Case No. 23-CV-55-ABJ

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**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT'S NOTICE OF  
CLAIMED VIOLATION OF ORDER ON DEFENDANT'S MOTION FOR SANCTIONS  
(DOC. NO 46)**

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Plaintiffs, through counsel, respond as follows:

Plaintiffs *have* supplied—as listed in Doc. 16—all documents that exist and are within their possession, custody, and control, that are responsive to Defendants' discovery requests concerning lost wages and lost income. (Please See Doc. 16). These include W-2s and tax returns for both Dr. Cumani and Mr. Shehu, and a written statement from Dr. Cumani's employer. There are no tangible documents relevant to reputation injury resulting from a wrongful criminal prosecution.

Further, as stated in open court on 4/15/24, Plaintiffs will supply any further documents that Defendant requests, once those documents are identified. Defendant has not identified what additional documents it seeks.

Plaintiffs have complied with discovery orders and have produced to Defendants the documents that prove their lost wage and income claims. Plaintiffs respectfully request that Defendant's motion be denied.

DATED this 25<sup>th</sup> day of April, 2024.

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CERTIFICATE OF SERVICE

I certify that I served the foregoing pleading this 25<sup>th</sup> day of April, 2024, to:

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